

# **EXHIBIT 7**

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**From:** Barry Shelton <bshelton@sheltoncoburn.com>  
**Sent:** Wednesday, June 9, 2021 8:54 AM  
**To:** mark waltfairllc.com  
**Subject:** RE: !! WSOU/Dell: Protective order issues

That's good to hear. The Gibson Dunn folks will take it from here, as I'm headed up your way tomorrow morning for voir dire, with trial next week.

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**From:** mark waltfairllc.com <mark@waltfairllc.com>  
**Sent:** Wednesday, June 9, 2021 7:50 AM  
**To:** Barry Shelton <bshelton@sheltoncoburn.com>  
**Subject:** FW: !! WSOU/Dell: Protective order issues

BTW, I have some traction on the issues we discussed in the PO. But they want a redline – because if you compare the PDF that was sent in the last email exchange on this topic with the redline we sent, there are changes that disregarded that the parties did not agree too. Regardless, we have traction.

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**From:** Barry Shelton <[bshelton@sheltoncoburn.com](mailto:bshelton@sheltoncoburn.com)>  
**Sent:** Tuesday, June 8, 2021 9:01 PM  
**To:** Jim Etheridge <[jim@etheridgelaw.com](mailto:jim@etheridgelaw.com)>; Sabanoglu, Kyanna <[KSabanoglu@gibsondunn.com](mailto:KSabanoglu@gibsondunn.com)>; \*\*\* GDC-Dell\_WSOU <[GDC-Dell\\_WSOU@gibsondunn.com](mailto:GDC-Dell_WSOU@gibsondunn.com)>  
**Cc:** mark waltfairllc.com <[mark@waltfairllc.com](mailto:mark@waltfairllc.com)>; Ryan Loveless <[ryan@etheridgelaw.com](mailto:ryan@etheridgelaw.com)>; Travis Richins <[travis@etheridgelaw.com](mailto:travis@etheridgelaw.com)>  
**Subject:** RE: !! WSOU/Dell: Protective order issues

Jim,

We are discussing the changes Mark and I negotiated with our clients and will get back to you with a redline soon. In the meantime, obviously we do not acquiesce in WSOU's previous proposal, in the same way we did not take WSOU's months of silence regarding the protective order as WSOU's agreement. Does WSOU agree to the trial groupings and discovery limits I proposed to Mark on May 27, namely the following groupings with the OGP default discovery limits for one case applying to each grouping in the aggregate?

Group 1: -475, -476, -477, -482  
Group 2: -473, -474, -478, -479  
Group 3: -480, -481, -485, -486

Regards,

Barry

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**From:** Jim Etheridge <[jim@etheridgelaw.com](mailto:jim@etheridgelaw.com)>  
**Sent:** Tuesday, June 8, 2021 7:49 PM  
**To:** Barry Shelton <[bshelton@sheltoncoburn.com](mailto:bshelton@sheltoncoburn.com)>; Sabanoglu, Kyanna <[KSabanoglu@gibsondunn.com](mailto:KSabanoglu@gibsondunn.com)>; \*\*\* GDC-Dell\_WSOU <[GDC-Dell\\_WSOU@gibsondunn.com](mailto:GDC-Dell_WSOU@gibsondunn.com)>  
**Cc:** mark waltfairllc.com <[mark@waltfairllc.com](mailto:mark@waltfairllc.com)>; Ryan Loveless <[ryan@etheridgelaw.com](mailto:ryan@etheridgelaw.com)>; Travis Richins <[travis@etheridgelaw.com](mailto:travis@etheridgelaw.com)>; Jim Etheridge <[jim@etheridgelaw.com](mailto:jim@etheridgelaw.com)>  
**Subject:** !! WSOU/Dell: Protective order issues

Barry,

As requested by Kyanna, we also ask that to the extent Dell has any edits to the WSOU proposed Protective Order, please make these changes with track changes.

If we don't hear back from you by Thursday, we will assume the parties are in agreement and we can submit WOSU's last version to the court.

Cordially,  
Jim

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**From:** Jim Etheridge <[jim@etheridgelaw.com](mailto:jim@etheridgelaw.com)>  
**Sent:** Wednesday, June 2, 2021 7:18 PM  
**To:** Barry Shelton ([bshelton@sheltoncoburn.com](mailto:bshelton@sheltoncoburn.com)) <[bshelton@sheltoncoburn.com](mailto:bshelton@sheltoncoburn.com)>  
**Cc:** mark waltfairllc.com <[mark@waltfairllc.com](mailto:mark@waltfairllc.com)>; Ryan Loveless <[ryan@etheridgelaw.com](mailto:ryan@etheridgelaw.com)>; Jim Etheridge <[jim@etheridgelaw.com](mailto:jim@etheridgelaw.com)>  
**Subject:** Re: WSOU/Dell: Protective order issues

Barry,

Thank you for your email. To move this forward, can you (Dell) please send a proper redline against the last version we sent you.

That would be helpful in resolving the issues.

Jim

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**From:** Barry Shelton <[bshelton@sheltoncoburn.com](mailto:bshelton@sheltoncoburn.com)>  
**Sent:** Wednesday, June 2, 2021 10:30 AM  
**To:** mark waltfairllc.com <[mark@waltfairllc.com](mailto:mark@waltfairllc.com)>  
**Subject:** WSOU/Dell: Protective order issues

Mark,

I hope you had a nice Memorial Day. Checking in to see if you have any feedback about the protective order issues we discussed last week. Thanks,

Barry

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